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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA
 WESTERN DIVISION

UNITED STATES OF AMERICA, et al.,
 Plaintiffs,

v.

MONTROSE CHEMICAL CORPORATION
 OF CALIFORNIA, et al.,
 Defendants.

AND RELATED COUNTERCLAIMS,
 CROSS-CLAIMS AND THIRD-PARTY
 ACTIONS

CASE NO. CV 90 3122-R

**NOTICE OF JOINDER AND JOINDER OF
 PLAINTIFFS' REQUEST TO ENTER
 PARTIAL CONSENT DECREE**

Judge: Hon. Manuel L. Real

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** Montrose Chemical Corporation of California
 3 (“Montrose”), Bayer CropScience Inc., News Publishing Australia Limited, and Stauffer
 4 Management Company LLC (the “Settling Defendants”) hereby join the Request to Enter Partial
 5 Consent Decree, filed by Plaintiffs, the United States of America, on August 20, 2012.

6 As set forth in Plaintiffs’ Request for Entry, it is appropriate to enter the Partial Consent
 7 Decree because the Partial Consent Decree is procedurally and substantively fair, reasonable, and
 8 consistent with the goals of CERCLA. *See United States v. Acorn Eng’g Co.*, 221 F.R.D. 530,
 9 539 (C.D. Cal. 2004). Further, in order to begin construction of this important environmental
 10 remediation project in a timely manner, and to take advantage of the parties’ progress in
 11 resolving groundwater disputes, **Settling Defendants respectfully urge this Court to enter the**
 12 **Partial Consent Decree before August 31, 2012.**

13 In order to keep the Court apprised of the parties’ continuing progress in this case,
 14 Montrose and Plaintiffs will continue to submit status conference reports to the Special Master
 15 regarding any material developments, as required by the Court’s February 17, 2012 Order.

16
 17 Respectfully submitted,

18
 19 Dated: August 21, 2012

LATHAM & WATKINS LLP

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 21 / s / Karl S. Lytz
 22 Karl S. Lytz
 23 Attorney for Defendant
 24 Montrose Chemical Corporation of California

25
 26 Dated: August 21, 2012

MCCARTER & ENGLISH, LLP

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 28 / s / J. Wylie Donald
 J. Wylie Donald
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 Stauffer Management Company LLC

1 Dated: August 21, 2012

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/ s / Peter Simshauser
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1 **PROOF OF SERVICE**

2 I am employed in the County of San Diego, State of California. I am over the age
3 of 18 years and not a party to this action. My business address is Latham & Watkins LLP, 600
West Broadway, Suite 1800, San Diego, CA 92101-3375.

4 On August 21, 2012, I served the following documents described as:

5 **NOTICE OF JOINDER AND JOINDER OF PLAINTIFFS' REQUEST TO ENTER**
6 **PARTIAL CONSENT DECREE**

7 by serving true copies of the above-described documents in the following manner:

8 **BY ELECTRONIC FILING**

9 I am familiar with the United States District Court, Central District of California's
10 practice for collecting and processing electronic filings. Under that practice, documents are
electronically filed with the court. The court's CM/ECF system will generate a Notice of
11 Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the
case. The NEF will constitute service of the document. Registration as a CM/ECF user
constitutes consent to electronic service through the court's transmission facilities. The CM/ECF
users that were served under said practice are identified below.

12 **BY U.S. MAIL**

13 I am familiar with the office practice of Latham & Watkins LLP for collecting and
14 processing documents for mailing with the United States Postal Service. Under that practice,
documents are deposited with the Latham & Watkins LLP personnel responsible for depositing
15 documents with the United States Postal Service; such documents are delivered to the United
States Postal Service on that same day in the ordinary course of business, with postage thereon
16 fully prepaid. I deposited in Latham & Watkins LLP' interoffice mail a sealed envelope or
package containing the above-described document and addressed as set forth below in
17 accordance with the office practice of Latham & Watkins LLP for collecting and processing
documents for mailing with the United States Postal Service:

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